

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-SRN-HB

Jamie Kreil,

Defendant.

STATEMENT INSTEAD OF REDACTED DOCUMENTS

Pursuant to Local Rule 5.6, Exhibits A, B, C, D, E, and F to the Declaration of Anne M. Lockner in Support of Jamie Kreil's Emergency Motion for Terminating Sanctions, a Temporary Restraining Order, and Attorneys' Fees have been filed under seal and redaction is impracticable because the interest in preserving the professional reputation, privacy and safety of the individuals identified in the documents outweighs any public interest in the sealed documents. Moreover, the individuals affected would suffer the very harm they seek to avoid, namely that, the disparaging material would be publicly available if the exhibits are not sealed.

DATED: October 21, 2020

ROBINS KAPLAN LLP

By: /s/ Anne M. Lockner

Anne M. Lockner (0295516)

J. Haynes Hansen (Bar No. 0399102)

Ena M. Kovacevic (Bar No. 0400149)

800 LaSalle Avenue, Suite 2800

Minneapolis, Minnesota 55402

T: (612) 349-8500

F: (612) 339-4181

alockner@robinskaplan.com

ekovacevic@robinskaplan.com

hhansen@robinskaplan.com

Counsel for Defendant Jamie Kreil